## SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

ONE MANHATTAN WEST NEW YORK, NY 10001

> TEL: (212) 735-3000 FAX: (212) 735-2000 www.skadden.com

DIRECT DIAL
2 | 2-735-2995
DIRECT FAX
9 | 7-777-2995
EMAIL ADDRESS
JOCELYN.STRAUBER@SKADDEN.COM

August 20, 2020

FIRM/AFFILIATE OFFICES BOSTON CHICAGO HOUSTON LOS ANGELES PALO ALTO WASHINGTON, D.C. WILMINGTON BEIJING FRANKFURT HONG KONG LONDON MOSCOW MUNICH **PARIS** SÃO PAULO SEOUL SHANGHAI

SINGAPORE

TOKYO TORONTO

## BY ECF

USDC SDNY

DOCUMENT

DATE FILED:

DOC #:

The Honorable Valerie E. Caproni United States District Court Southern District of New York 40 Foley Square New York, NY 10007

ELECTRONICALLY FILED

08/21/2020

**MEMO ENDORSED** 

Re: United States v. Velez, 19 Cr. 862 (Deeshuntee Stevens)

Dear Judge Caproni:

I write on behalf of my client, Deeshuntee Stevens, and with the consent of the Government, to respectfully request that Mr. Stevens be released on bail pending trial in the above-referenced matter, on the conditions proposed below.

Mr. Stevens has been detained at the Metropolitan Correctional Center ("MCC") since his arrest on January 15, 2020. Mr. Stevens is charged in the above-referenced matter with conspiracy to distribute heroin, fentanyl and other narcotics, in violation of 21 U.S.C. §§ 841(a)(1), 846, and possession of a firearm during and in relation to a drug trafficking offense, in violation of 18 U.S.C. §§ 924(c), 2.

The Government has agreed that the following proposed conditions will reasonably assure Mr. Stevens' appearance in Court and the safety of the community. *See* 18 U.S.C. § 3142(c)(1). The proposed conditions, to be met prior to Mr. Stevens' release, include: (1) home detention for 24 hours per day with electronic monitoring, except to attend work, to seek employment (with agreement of

Hon. Valerie E. Caproni August 20, 2020 Page 2

the office of Pretrial Services as to the specifics), and for medical visits and legal visits, at the Rochester, New York home of Jesseivett Orta, a close family friend who has known Mr. Stevens for 12 years and who will serve as a third-party custodian; (2) a personal recognizance bond in the amount of \$100,000, to be signed by Mr. Stevens and co-signed by three financially responsible persons: Deborah Stevens (Mr. Stevens' mother), John Arthur Wilkerson (Deborah Stevens' fiancé), and Melissa Blondet (the mother of two of Mr. Stevens' children), pending approval by the U.S. Attorney's Office for the Southern District of New York; (3) outpatient drug treatment and testing; (4) surrender of any travel documents and no new applications; and (5) all other standard conditions of release.

Respectfully submitted,

s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Adam S. Hobson Assistant U.S. Attorney Elinor L. Tarlow

Mr. Stevens' unopposed bail motion is granted, subject to the following conditions:

- A \$100,000 personal recognizance bond, to be signed by the defendant and co-signed by three financially responsible persons: Deborah Stevens (the defendant's mother), John Arthur Wilkerson (Deborah Steven's fiancé), and Melissa Blondet (the mother of two of the defendant's children), pending approval by the U.S. Attorney's Officer for the Southern District of New York.
- Home detention enforced by electronic monitoring, except to attend work, to seek employment (with agreement of the office of Pretrial Services as to the specifics), and for medical visits and legal visits, at the Rochester, New York home of Jesseivett Orta, a close family friend who will serve as third-party custodian.
- Defendant is permitted to self-install the home monitoring unit under the direction and instruction of Pretrial Services.
- Defendant shall immediately report to the Pretrial Services office upon his release from custody, or as otherwise instructed by Pretrial Services, to be fitted with the location monitoring equipment. Unless otherwise approved by the Court, the location monitoring equipment shall be installed no later than 14 days after release, during which the defendant is required to self-quarantine.
- Surrender travel documents and make no new applications.
- Travel restricted to the State of New York.
- Drug testing/treatment as directed by Pretrial Services.
- Not to possess a firearm, destructive device or other dangerous weapon.
- No contact with co-defendants unless in the presence of counsel.

SO ORDERED.

Date: 08/21/2020

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE